

1 KYLE ANNE CITRYNELL, ESQ.
2 citrynell@derbycitylaw.com
3 CHRISTOPHER A. BATES, ESQ.
4 bates@derbycitylaw.com
5 SEILLER WATERMAN, LLC
6 462 S. Fourth Street
7 Meidinger Tower, 22nd Floor
8 Louisville, Kentucky 40202
9 Telephone: (502) 584-7400
10 *Admitted Pro Hac Vice*

11 L. CHRISTOPHER ROSE, ESQ.
12 Nevada Bar No. 7500
13 lcr@juww.com
14 TYLER N. URE, ESQ.
15 Nevada Bar No. 11730
16 tnu@juww.com
17 JOLLEY URGa WOODBURY & LITTLE
18 3800 Howard Hughes Pkwy., #1600
19 Las Vegas, Nevada 89169
20 Telephone: (702) 699-7500
21 Facsimile: (702) 699-7555
22 *Attorneys for Plaintiff*

23 UNITED STATES DISTRICT COURT
24 DISTRICT OF NEVADA

25 CRUSHER DESIGNS, LLC,
26
27 Plaintiff,

vs.

ATLAS COPCO POWERCRUSHER GmbH;
ATLAS COPCO U.S.A. HOLDINGS, INC.;
and MINING, ROCK EXCAVATION AND
CONSTRUCTION, LLC,
Defendants.

Case No. 2:14-cv-01267-GMN-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
PLAINTIFF, CRUSHER DESIGNS, LLC,
TO RESPOND TO DEFENDANTS'
MOTION TO DISMISS**

(First Request)

1 Plaintiff Crusher Designs, LLC (“Plaintiff” or “Crusher Designs”), on the one hand, and
2 Defendants Atlas Copco U.S.A. Holdings, Inc. and Mining, Rock Excavation and Construction,
3 LLC (together, the “Defendants”), on the other hand, state the following:

- 4 1. The Complaint was filed on August 1, 2014 (Doc. No. 1);
- 5 2. A First Amended Complaint was filed on November 21, 2014 (Doc. No. 13);
- 6 3. Defendant Atlas Copco U.S.A. Holdings, Inc. was served with the First Amended
7 Complaint on December 18, 2014 (Doc. No. 17);
- 8 4. Defendant Mining, Rock Excavation and Construction, LLC was served with the
9 First Amended Complaint on December 22, 2014 (Doc. No. 18);
- 10 5. Plaintiff was served with Defendants’ Motion to Dismiss on January 20, 2015
11 (Doc. No. 21);
- 12 6. Due to intervening matters, Plaintiff requested an agreement for an extension of
13 time from Defendants of ten (10) days to respond to Defendants’ Motion to Dismiss, to which
14 Defendants agreed;
- 15 7. No party will be prejudiced by the agreed-upon extension;

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

8. Therefore, good cause exists to extend the date for Plaintiff to respond to Defendants' Motion to Dismiss on or before February 16, 2015.

IT IS SO AGREED AND STIPULATED:

SEILLER WATERMAN, LLC

LEWIS ROCA ROTHGERBER, LLP

/s/ L. Christopher Rose

/s/ Meng Zhong

Kyle Ann Citrynell, Esq.

Michael J. McCue, Esq., #6055

Christopher A. Bates, Esq.

Jonathan W. Fountain, Esq., #10351

462 S. Fourth Street

Meng Zhong, Esq., #12145

Meidinger Tower, 22nd Floor

3993 Howard Hughes Parkway, #600

Louisville, Kentucky 40202

Las Vegas, Nevada 89169

Admitted Pro Hac Vice

*Attorneys for Defendants Atlas Copco USA
Holdings Inc. and Mining, Rock Excavation
and Construction LLC*

L. Christopher Rose, Esq., #7500

Tyler N. Ure, Esq., #11730

3800 Howard Hughes Parkway, #1600

Las Vegas, Nevada 89169

Attorneys for Plaintiff

IT IS SO ORDERED.


Gloria M. Navarro, Chief Judge
United States District Court

DATED: 02/04/2015

CERTIFICATE OF SERVICE

This will hereby certify that I am employed in the County of Clark, State of Nevada, am over the age of 18 years and not a party to this action. My business address is that of Jolley Urga Woodbury & Little, 3800 Howard Hughes Parkway, 16th Floor, Las Vegas, Nevada 89169.

This is to certify that on the 4th day of February 2015, I electronically filed the **STIPULATION AND ORDER FOR EXTENSION OF TIME FOR PLAINTIFF, CRUSHER DESIGNS, LLC, TO RESPOND TO DEFENDANTS' MOTION TO DISMISS (First Request)**

with the Clerk of Court using the CM/ECF system, which will cause the document to be served upon all current counsel of record.

/s/ Kelly McGee

An Employee of JOLLEY URGA
WOODBURY & LITTLE